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U.S. Department

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 6, 2023

BY ECF

The Honorable Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Jamil Hakime*, 22 Cr. 699 (AT)

Dear Judge Torres:


The Government respectfully submits this letter to request that time be excluded under the Speedy Trial Act from today's date through the date of the upcoming initial pretrial conference in this case, currently scheduled for January 18, 2023 at 3:30 p.m. (Dkt. No. 8). On January 4, 2023, the defendant was arraigned on the three-count Indictment before United States Magistrate Judge Sarah Netburn. At the arraignment, the defendant objected to the Government's request for the exclusion of time between January 4 and January 18, and Judge Netburn denied the Government's request on that basis.

The Government now renews its request for the exclusion of time under the Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(7)(A), until January 18 to permit the Government adequate time to prepare the voluminous discovery in this matter. *See* 18 U.S.C. § 3161(h)(7)(B)(iv) (providing that the Court shall consider "[w]hether the failure to grant such a continuance . . . would deny . . . the attorney for the Government the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.") The Government is in the process of preparing a large production of discovery containing approximately 760 gigabytes of data, including, among other things, seven electronic devices, seven search warrants and search warrant returns, audio recordings, and extensive law enforcement case files. The requested exclusion of time will afford the Government sufficient time to exercise its due diligence in preparing and producing the discovery to the defense. In addition, the requested exclusion of time will afford the defense time to review

discovery and to prepare an adequate defense, and will permit the parties to engage in discussions regarding the potential for a pretrial disposition.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: 

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GRANTED. Time until **January 18, 2023**, is excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7), because the ends of justice served by excluding such time outweigh the interests of the public and Defendant in a speedy trial in that this will allow the Government to prepare and produce discovery and allow the parties to review discovery and discuss disposition of the case.

SO ORDERED.

Dated: January 9, 2023
New York, New York



ANALISA TORRES
United States District Judge